

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**

REHANA BIBI,

*Plaintiff,*

v.

MIR SHAKIL-UR-RAHMAN, et al.,

*Defendants.*

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Case No.: 1:20-CV-1478-LMB-MSM

**DECLARATION OF FAISAL MASIH**

I, Faisal Masih, declare the following to be true to the best of my knowledge:

1. I am 31 years old and reside in Lahore, Pakistan.
2. Rehana Bibi is my first cousin. I refer to Mrs. Shaheena Rahman as Aunty Shaheena. It is my understanding that Mrs. Bibi has filed a lawsuit in the United States against Mrs. Rahman and her husband, and Mr. and Mrs. Yahya.
3. On July 5, 2021, Mrs. Bibi's husband, Riaz Masih, came to my house. He was accompanied by his son-in-law, Akash Buta.
4. My wife Mrs. Mehwish Anwar, my three minor sons, and one of my brothers, Shahzad Manzoor, were also at my house with me and were present for this conversation with Riaz and Akash.
5. Mrs. Bibi's husband, Riaz told me that he believes I have information on my computer that could help Aunty Shaheena [Mrs. Rahman] in the lawsuit by Mrs. Bibi against her, and he is worried that I might give this information to Aunty Shaheena and that I would favor Aunty Shaheena and the Yahyas instead of Ms. Bibi. Riaz accused me of speaking with Aunty Shaheena, and warned me that the information he thinks I have could be damaging to Mrs. Bibi's case. Riaz said he does not want me to talk to Aunty Shaheena about information I have about Mrs. Bibi, or to provide any data that Mrs. Bibi sent me from her phone.
6. He told me that I should take back what I said (meaning, what he thinks I told Aunty Shaheena). He said I am his relative, and asked why am I helping the other side in the lawsuit (meaning the Rahmans and the Yahyas). He said I should not help them, and that I am one of their own, and that I am betraying my own family and helping others who are not part of their family.

7. I first listened to what Mrs. Bibi's husband had to say. Then I told him that I would not lie, and I would not help anyone else lie. I told him that I cannot ever support lying. What is true, is true. I told him that he is my relative and can get angry with me if he wants. I told him he was welcome to discuss matters with me. But I also told him I cannot side with the lies. What would I be teaching my children if I lie? I am raising my children to tell the truth, not to lie. If I lie to support the Bibi's, my children will learn that lying is acceptable. I told him that is unacceptable, and that I am going to tell the truth regardless of what he wants.
8. Mrs. Bibi's husband then threatened me. He told me that he will have me kidnapped. He said he would send gangsters to beat me. He said he would have me arrested by the police. He made the same threats towards my mother. He threatened my brothers that he will do bad things to me. He said he would go to an influential person in our community named Bilal Choudhary to force me to cooperate with Mrs. Bibi's case.
9. Riaz said, "I will show you who I am. I am not responsible for what I have to do now," and then left the house angrily.
10. I will not help Mrs. Bibi or her husband tell lies in this lawsuit. I will tell only the truth, and I am willing to testify in court if necessary.
11. I so state under penalty of perjury:

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Faisal Masih

Dated:

DECLARATION OF TRANSLATOR

I, Hameedullah Virk, declare under perjury the following is true:

- (1) I am competent to translate English to Urdu and Urdu to English.
- (2) On the date below, I spoke with Faisal Masih by telephone, I translated the above text from English into Urdu, and asked Mr. Masih if it was true and accurate. He affirmed that it was.

Dated:

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Hameedullah Virk,  
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